

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CARLETON  
NELSON; CASEY KIRSCHNER;  
ALLCORE DEVELOPMENT LLC;  
FINBRIT HOLDINGS LLC; CHESHIRE  
VENTURES LLC; 2010 IRREVOCABLE  
TRUST; SIGMA REGENERATIVE  
SOLUTIONS LLC; CTBSRM, INC.;  
RODNEY ATHERTON; DEMETRIUS VON  
LACEY; RENRETS LLC,

Defendants.

CASE NO. 1:20-CV-484-RDA-IDD

800 HOYT LLC,

Intervening Interpleader  
Plaintiff, Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants,  
Interpleader Counter-Plaintiffs.

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Plaintiffs Amazon.com Inc. and Amazon Data Services, Inc. (collectively, “Amazon”) hereby respond to Defendants’ Motion to Extend the Time to File Responses and Replies to the Currently Pending Motions in Limine in Light of the Court’s Order on Summary Judgment. Dkt. 1378 (“Mot.”). As of this afternoon, Amazon understands that Defendants have decided that they will not file their responses to motions *in limine* today in accordance with the schedule this Court previously ordered. *See* Dkt. 1298. Defendants, thus, moved for an extension of that deadline a short time ago. *See* Dkt. 1378. Contrary to Defendants’ assertion, Amazon does not oppose the relief Defendants request.<sup>1</sup>

Amazon responds here to note that it has worked strenuously to be in a position to meet the Court’s deadline today, even in light of the Court’s Order on Summary Judgment. Amazon stands ready to file its responses to Defendants’ pre-trial motions promptly if the Court denies Defendants’ extension motion.

---

<sup>1</sup> Defendants indicated at 3:17 p.m. ET that they would tell the Court that Amazon opposes the motion if it did not state otherwise before 4 p.m. Amazon had not responded by their deadline.

Dated: April 7, 2023

Respectfully submitted,

Veronica S. Moyé (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue, Suite 2100  
Dallas, TX 75201  
Telephone: (214) 698-3100  
Facsimile: (214) 571-2900  
vmoye@gibsondunn.com

/s/ Michael R. Dziuban  
Elizabeth P. Papez (*pro hac vice*)  
Patrick F. Stokes (*pro hac vice*)  
Jason J. Mendro (*pro hac vice*)  
Claudia M. Barrett (*pro hac vice*)  
David W. Casazza (*pro hac vice*)  
Amanda J. Sterling (*pro hac vice*)  
Michael R. Dziuban (Va. State Bar No. 89136)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
epapez@gibsondunn.com  
pstokes@gibsondunn.com  
jmendro@gibsondunn.com  
cbarrett@gibsondunn.com  
dcasazza@gibsondunn.com  
asterling@gibsondunn.com  
mdziuban@gibsondunn.com

*Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

CTBSRM, Inc.  
6870 W 52nd Ave., Ste. 203  
Arvada, CO 80002

Demetrius Von Lacey  
2845 Des Moines Dr.  
Fort Collins, CO 80525

Casey Kirschner  
635 N. Alvarado Lane  
Plymouth, MN 55447  
By email: casey.kirschner@gmail.com

2010 Irrevocable Trust  
6870 W 52nd Ave., Ste. 203  
Arvada, CO 80002

Sigma Regenerative Solutions, LLC  
6870 W 52nd Ave., Ste. 203  
Arvada, CO 80002

/s/ Michael R. Dziuban

Michael R. Dziuban  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539  
mdziuban@gibsondunn.com

*Counsel for Plaintiffs Amazon.com, Inc. and Amazon  
Data Services, Inc*